

March 2, 2009

Mr. Mark Durno  
On-Scene Coordinator  
Emergency Response Branch  
U.S. Environmental Protection Agency, Region 5  
25089 Center Ridge Road  
Westlake, Ohio 44145



**Subject: Final Letter Report  
Miller Salvage PRP Site  
Latham, Pike County, Ohio  
Technical Direction Document No. S05-0711-009**

Dear Mr. Durno:

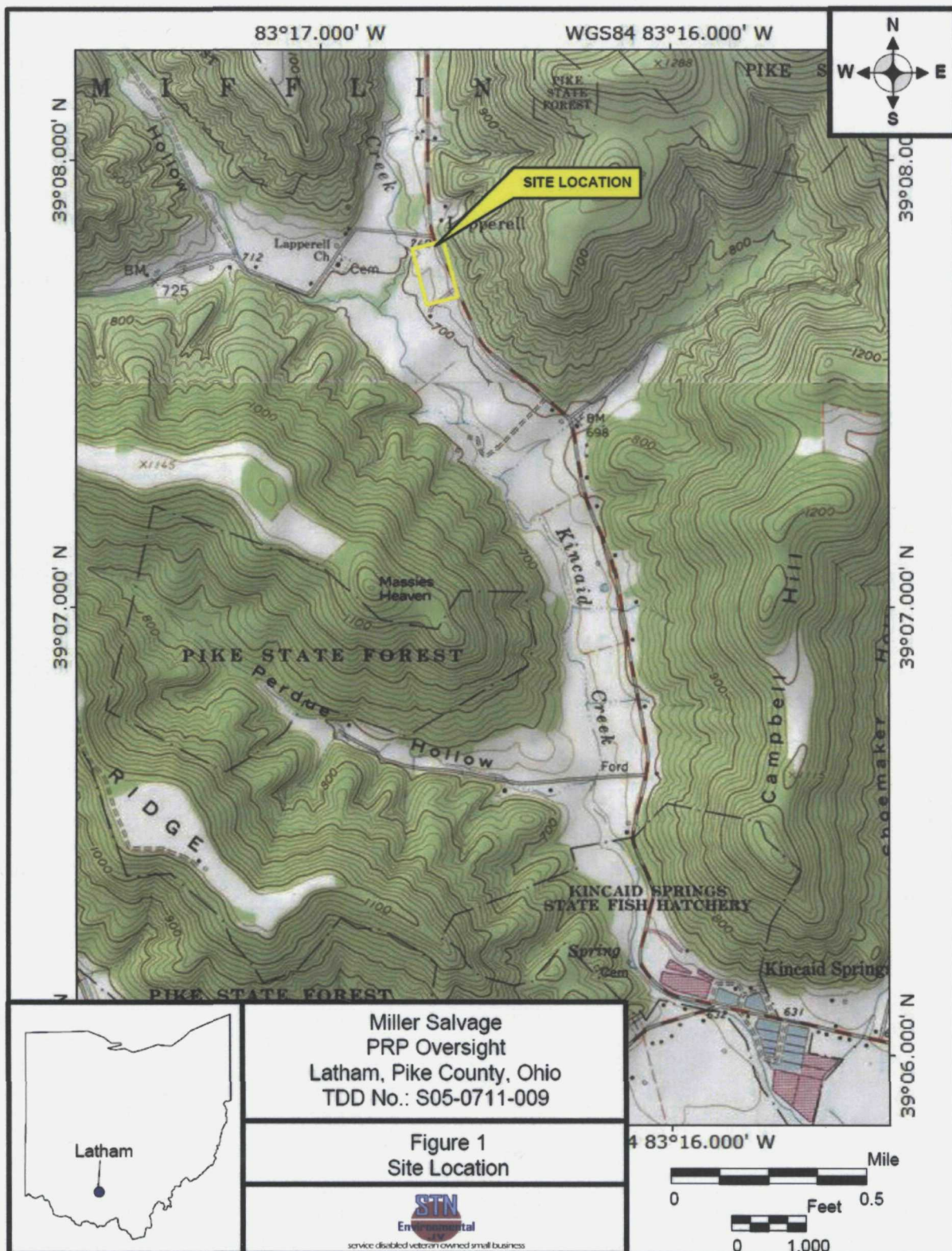
T N & Associates, Inc. (TN&A), a member of the STN Environmental Joint Venture with Sullivan International Group, Inc., has prepared this removal action letter report in accordance with the requirements of U.S. Environmental Protection Agency (U.S. EPA) Technical Direction Document (TDD) No. S05-0711-009. The scope of this TDD was to conduct oversight activities at the Miller Salvage Potentially Responsible Party (PRP) site in Latham, Pike County, Ohio. START was tasked to conduct oversight of removal activities during one trip every other week. In addition, START was tasked to prepare this Letter Report. Karen Campbell of TN&A was the START representative at the site. Removal activities were conducted by the PRPs contractor, Conestoga-Rovers & Associates (CRA), BWC Trucking, and W D Farms trucking.

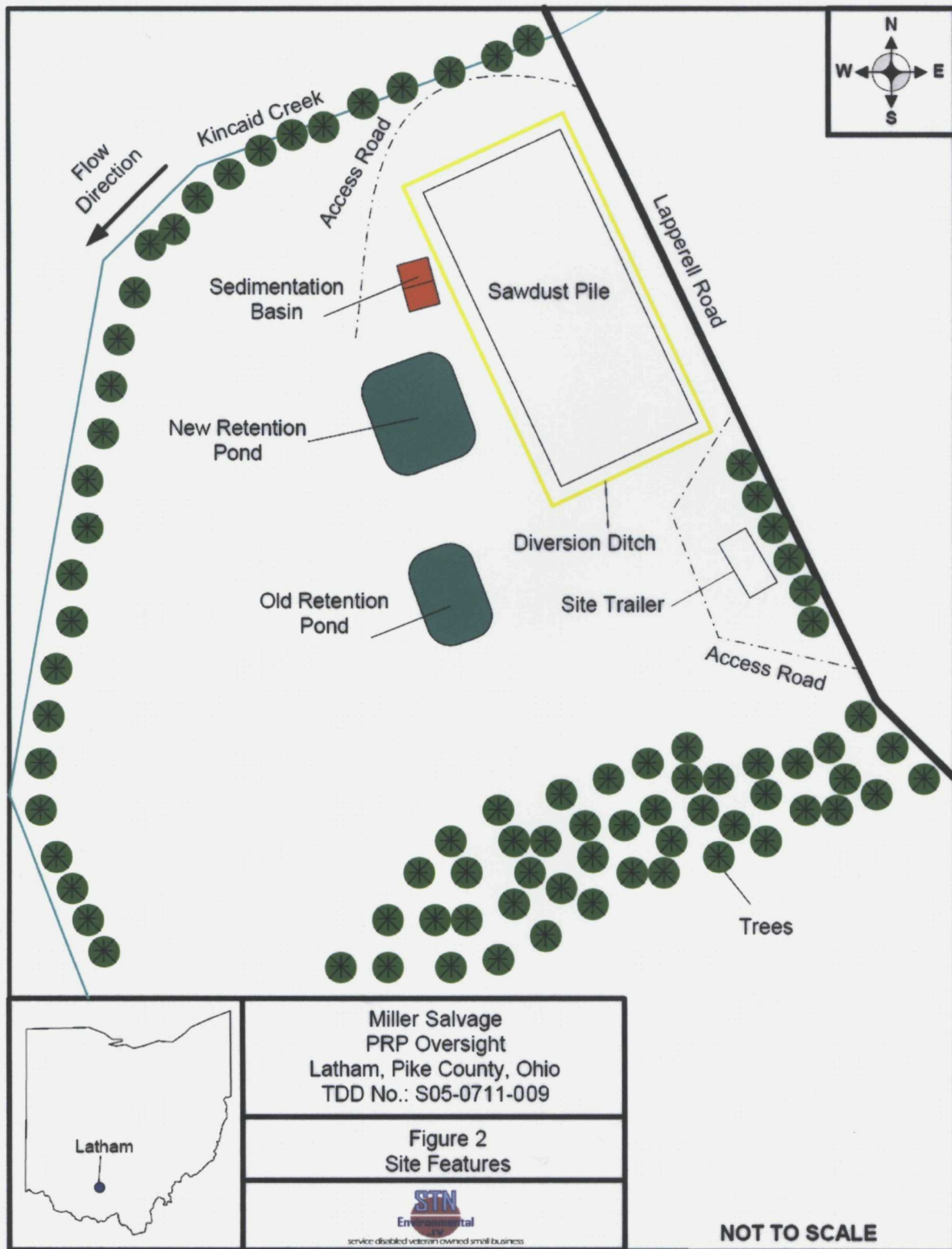
This final Letter Report summarizes the site background; discusses the removal action activities, and provides a summary of the removal action. Appendix A presents a photographic log of removal actions activities.

## **Site Description**

The Miller Salvage site is located at 1617 Lapperell Road in Latham, Ohio, at 39° 08.212' north latitude and -83° 16.780' west longitude. The site sits on an approximate 13-acre parcel of property and the wood waste pile is approximately 30 feet high and 5 acres in size. There are two retention ponds on site, the smaller of which (200,000 gallons) was blocked from receiving any more liquid. The site is located in a rural area, with residential properties within one quarter mile of the site. Kincaid Creek borders the site to the north (less than 250 feet







from the pile) and flows along the western portion of the property (approximately 1,500 feet from the pile). Kincaid Spring is located approximately 1 mile downstream from the site and an ODNR fish Hatchery is located less than 2 miles downstream from the site.

## **Site Background and History**

Since 1993, Miller Salvage (also doing business as Miller Lumber or WD Miller Enterprises) has received waste saw dust, waste particle board, and other wood wastes from Mill's Pride, Ltd., a manufacturing facility located in Waverly, Ohio. Over the years, Ohio EPA has repeatedly cited the site for multiple types of operation violations regarding pollution controls and offsite water pollution. On April 15, 2005, a Preliminary Injunction Consent Order was filed with the Pike County Court of Common Pleas. The order required that numerous controls and waste removal practices be conducted at the site. During the past year, the facility no longer received or removed sawdust material. Additionally, the facility has managed leachate level in the large leachate pond by recirculating leachate back onto the wood pile using large irrigation spray guns. On November 14, 2006, the Pike County Court upheld an Ohio EPA order for the facility to establish and maintain 2 feet of freeboard. The facility had failed to do so. The ammonia concentration in the pond ranges from 800 to over 2,600 parts per million.

Over the past several years, the wood waste pile has grown to over 30 feet high and covers 5 acres of land. High levels of ammonia and lower levels of other hazardous substances are present in the material. Two leachate ponds (one is 200,000 gallons and the other is 1.9 million gallons) are on site. According to the Ohio EPA, leachate, contaminated with high concentrations of ammonia, seeps via karst geologic groundwater pathways into nearby Kincaid Creek. Because of the suspected migration of leachate, the smaller retention pond was blocked from receiving any additional run-off material and the larger retention pond was constructed.

Kincaid Creek is the sole source of water for an Ohio Department of Natural Resources (ODNR) fish hatchery. Since 2003, there have been at least 3 events where large volumes of ammonia laden leachate were released from the site. During each event, the contaminated leachate impacted Kincaid Creek, Kincaid Spring (a natural spring which is used as a secondary source of drinking water by local residents) and subsequently, the operation of the ODNR Kincaid State Fish Hatchery. On many occasions, the hatchery was forced to evacuate their fish stock due to highly toxic ammonia levels in Kincaid Creek in order to prevent onsite mass fish kills.

Ohio EPA requires that at least 2 feet of freeboard be kept in the newly constructed retention pond. Initially, excess leachate was removed from the site via tanker trucks; however, the site owner discontinued this practice and recirculation pumps were installed in order to prevent leachate from flowing off site. Leachate was also pooled on top of the wood pile to an average depth of approximately 3 feet across the whole pile. Since Miller Salvage was not in compliance with the 2 feet of freeboard requirement mandated by the Preliminary Injunction Consent Order of the Pike County Court of Common Pleas, Ohio EPA had requested U.S. EPA to conduct removal actions to protect Kincaid Creek from imminent threats of mass leachate releases.

The Miller Salvage company had declared bankruptcy and responsibility for the site was voluntarily undertaken by Mill's Pride Ltd., the generator of the sawdust material and its parent company MASCO Corporation.

On February 1, 2007, U.S. EPA, START and Ohio EPA personnel met with the PRP representatives and discussed site activities. The leachate level was at 8.75 feet (maximum depth of pond is 10 feet).

Beginning in February 2007 Mill's Pride Ltd. began pumping leachate from the retention pond at the Miller Salvage site under a Voluntary Action. U.S. EPA and Ohio EPA provided full oversight of operations until the end of May when the pumping operations were downgraded to 3 loads a day 5 days a week and the imminent threat of the release of ammonia contaminated leachate to the Kincaid Creek was removed. The PRP continued with the 3 loads a day pumping operations through the end of November 2007. All leachate was transported to either the Huntington Waste Water Treatment Plant (Huntington, West Virginia) or the Chillicothe Waste Water Treatment Plant (Chillicothe, Ohio).

### **Removal Action Activities**

The PRP signed an Administrative Settlement Agreement and Order on Consent for Removal Action between Mill's Pride, LP and Region V of the United States Protection Agency Docket No. V-W-'08-C-887 at the beginning of December 2007 and all work for the site under the Consent Order was conducted under the START TDD (S05-0711-009).

Several other options were considered for disposal of the sawdust material, including selling the material to be burned for boiler fuel and selling the material to be used for solidification purposes; however, these options were not viable due to the saturation content of the material. The sawdust material was transported to Beech Hollow Landfill in Wellston, Ohio and, after final approval from U.S. EPA, to the Pike Sanitation Landfill in Waverly.

Ohio beginning in February, 2008 for disposal. The sawdust began being transported to the landfills on November 6, 2007, and continued through May 8, 2008. Approximately 138,036 tons of sawdust was removed from the site. Approximately 78,411 tons were shipped to Beech Hollow Landfill; 59,548 tons were shipped to Pike Sanitation Landfill and 43 tons to Pine Grove Landfill (solidification testing).

As the sawdust pile decreased several drainage ditches were constructed to prevent runoff water from Lapperell Road running into the sawdust pile and ultimately the new retention pond. As part of the removal activities, the standing leachate in the old retention pond was transferred to the new retention pond, and sediments were removed and placed on the sawdust pile for off-site disposal. Finally, the area was graded in order to prevent standing water.

The total amount of leachate removed from the new retention pond was approximately 16,830,050 gallons starting on February 1, 2007, and ending on April 24, 2008. The leachate was disposed of at three Publicly Owned Treatment Works (POTWs) in Huntington, West Virginia; Chillicothe, Ohio and Circleville, Ohio.

The sediment was removed from the new retention pond once the leachate was removed and placed on the sawdust pile for disposal. A drainage ditch was excavated along the sedimentation basin to prevent run off from flowing into the sedimentation basin.

After all of the sawdust material was removed, the property was graded. The PRP made several attempts to vegetate the site and final work will occur in Spring 2009.

## **Summary**

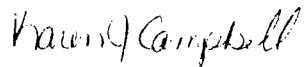
The PRP entered into negotiations with the U.S. EPA regarding the removal of the sawdust pile and in December 2007 signed a consent order for the removal of the sawdust material. U.S. EPA continued to provide oversight for the ongoing activities (leachate removal and sawdust removal) under a different START TDD (S05-0711-009).

The sawdust began being transported to the landfills on November 6, 2007, and was completed on May 8, 2008. Approximately 138,036 tons of sawdust was removed from the site. The sawdust was transported to Beech Hollow Landfill in Wellston, Ohio and Pike Sanitation Landfill in Waverly, Ohio. The total amount of leachate removed from the new retention pond was approximately 16,830,050 gallons starting on February 1, 2007, and

ending on April 24, 2008. The leachate was disposed of at three Publicly Owned Treatment Works (POTWs) in Huntington, West Virginia; Chillicothe, Ohio and Circleville, Ohio. The old retention pond was closed and graded for drainage. The new retention was drained of leachate and the sediment was removed and transported off site for disposal. The sedimentation basin was also cleaned out and a drainage system was set up to prevent run off from flowing into the sedimentation basin. The PRP made several attempts at vegetating the property, but due to weather considerations, final vegetation will occur in Spring 2009.

If you have any questions or comments regarding this letter report, please call me at (317) 313-1136.

Sincerely,



Karen Campbell, P.E.

TN&A START Project Manager

Appendix A Photographic Log

cc: Lorraine Kosik, U.S. EPA START Project Officer  
Raghu Nagam, STN START Program Manager



**APPENDIX A**  
**PHOTOGRAPHIC LOG**  
**(Seven Pages)**



<b>Photograph No.:</b>	1	<b>Orientation:</b>	South
<b>TDD Number:</b>	S05-0711-009	<b>Date:</b>	January 10, 2008
<b>Photographer:</b>	K. Campbell, START	<b>Site Name:</b>	Miller Salvage PRP Removal Site
<b>Location:</b>	Latham, Pike County, Ohio		
<b>Subject:</b>	PRP preparing sawdust for disposal.		



<b>Photograph No.:</b>	2	<b>Orientation:</b>	East
<b>TDD Number:</b>	S05-0711-009	<b>Date:</b>	January 24, 2008
<b>Photographer:</b>	K. Campbell, START	<b>Site Name:</b>	Miller Salvage PRP Removal Site
<b>Location:</b>	Latham, Pike County, Ohio		
<b>Subject:</b>	Freeboard on the large lined retention pond.		



<b>Photograph No.:</b>	3	<b>Orientation:</b>	South
<b>TDD Number:</b>	S05-0711-009	<b>Date:</b>	February 5, 2008
<b>Photographer:</b>	K. Campbell, START	<b>Site Name:</b>	Miller Salvage PRP Removal Site
<b>Location:</b>	Latham, Pike County, Ohio		
<b>Subject:</b>	Drainage ditch to the clay in the middle of the sawdust pile.		



<b>Photograph No.:</b>	4	<b>Orientation:</b>	North
<b>TDD Number:</b>	S05-0711-009	<b>Date:</b>	March 5, 2008
<b>Photographer:</b>	K. Campbell, START	<b>Site Name:</b>	Miller Salvage PRP Removal Site
<b>Location:</b>	Latham, Pike County, Ohio		
<b>Subject:</b>	PRP equipment moving sawdust to the north side of the pile for disposal.		



<b>Photograph No.:</b>	5	<b>Orientation:</b>	North
<b>TDD Number:</b>	S05-0711-009	<b>Date:</b>	March 18, 2008
<b>Photographer:</b>	K. Campbell, START	<b>Site Name:</b>	Miller Salvage PRP Removal Site
<b>Location:</b>	Latham, Pike County, Ohio		
<b>Subject:</b>	Sedimentation basin for runoff water.		



<b>Photograph No.:</b>	6	<b>Orientation:</b>	Southeast
<b>TDD Number:</b>	S05-0711-009	<b>Date:</b>	March 18, 2008
<b>Photographer:</b>	K. Campbell, START	<b>Site Name:</b>	Miller Salvage PRP Removal Site
<b>Location:</b>	Latham, Pike County, Ohio		
<b>Subject:</b>	Truck pumping water from retention pond and PRP preparing sawdust for disposal.		



<b>Photograph No.:</b>	7	<b>Orientation:</b>	South
<b>TDD Number:</b>	S05-0711-009	<b>Date:</b>	April 1, 2008
<b>Photographer:</b>	K. Campbell, START	<b>Site Name:</b>	Miller Salvage PRP Removal Site
<b>Location:</b>	Latham, Pike County, Ohio		
<b>Subject:</b>	PRP removing the old unlined retention pond.		



<b>Photograph No.:</b>	8	<b>Orientation:</b>	North
<b>TDD Number:</b>	S05-0711-009	<b>Date:</b>	April 17, 2008
<b>Photographer:</b>	K. Campbell, START	<b>Site Name:</b>	Miller Salvage PRP Removal Site
<b>Location:</b>	Latham, Pike County, Ohio		
<b>Subject:</b>	Sawdust pile with the south end already removed down to the clay layer.		



<b>Photograph No.:</b>	9	<b>Orientation:</b>	West
<b>TDD Number:</b>	S05-0711-009	<b>Date:</b>	April 17, 2008
<b>Photographer:</b>	K. Campbell, START	<b>Site Name:</b>	Miller Salvage PRP Removal Site
<b>Location:</b>	Latham, Pike County, Ohio		
<b>Subject:</b>	New retention pond with water pumped down to sediment.		



<b>Photograph No.:</b>	10	<b>Orientation:</b>	Northeast
<b>TDD Number:</b>	S05-0711-009	<b>Date:</b>	April 29, 2008
<b>Photographer:</b>	K. Campbell, START	<b>Site Name:</b>	Miller Salvage PRP Removal Site
<b>Location:</b>	Latham, Pike County, Ohio		
<b>Subject:</b>	North end of the sawdust pile loading sawdust into trucks.		



<b>Photograph No.:</b>	11	<b>Orientation:</b>	East
<b>TDD Number:</b>	S05-0711-009	<b>Date:</b>	April 29, 2008
<b>Photographer:</b>	K. Campbell, START	<b>Site Name:</b>	Miller Salvage PRP Removal Site
<b>Location:</b>	Latham, Pike County, Ohio		
<b>Subject:</b>	PRP loading trucks for sawdust disposal.		



<b>Photograph No.:</b>	12	<b>Orientation:</b>	North
<b>TDD Number:</b>	S05-0711-009	<b>Date:</b>	May 22, 2008
<b>Photographer:</b>	K. Campbell, START	<b>Site Name:</b>	Miller Salvage PRP Removal Site
<b>Location:</b>	Latham, Pike County, Ohio		
<b>Subject:</b>	Site with sawdust pile completely removed down to the native clay layer.		



<b>Photograph No.:</b>	13	<b>Orientation:</b>	Southeast
<b>TDD Number:</b>	S05-0711-009	<b>Date:</b>	May 22, 2008
<b>Photographer:</b>	K. Campbell, START	<b>Site Name:</b>	Miller Salvage PRP Removal Site
<b>Location:</b>	Latham, Pike County, Ohio		
<b>Subject:</b>	Site sloped for drainage.		



<b>Photograph No.:</b>	14	<b>Orientation:</b>	N/A
<b>TDD Number:</b>	S05-0711-009	<b>Date:</b>	May 22, 2008
<b>Photographer:</b>	K. Campbell, START	<b>Site Name:</b>	Miller Salvage PRP Removal Site
<b>Location:</b>	Latham, Pike County, Ohio		
<b>Subject:</b>	Cleaned out sedimentation basin.		